



### REMARKS

In an Office Action mailed on December 29, 2005, claims 1, 2, 4 and 7 were rejected under 35 U.S.C. § 102(b) as being anticipated by Achee; claims 29-35 were rejected under 35 U.S.C. § 102(e) as being anticipated by Lund; claim 3 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Achee in view of Strattan; claims 5 and 6 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Achee in view of Ringgenberg; claims 9-15, 17 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Achee in view of Gano; claim 16 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Achee in view of Gano and further in view of Donnelly; claims 9-15, 17 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Achee in view of Shy; and claim 16 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Achee in view of Shy and further in view of Donnelly.

The §§ 102 and 103 rejections are addressed below in the corresponding sections.

#### §§ 102 and 103 Rejections of Claims 1-18:

The one-trip system of independent claim 1 includes a tubing hanger, a production tubing, a perforating gun assembly and a screen assembly, which are adapted to be run downhole as a unit.

Contrary to the limitations of independent claim 1, Achee discloses a bottom hole assembly 18 that includes a gravel pack screen 28. Contrary to the limitations of independent claim 1, however, the bottom hole assembly 18 does not include a perforating gun assembly. Instead, Achee states that the perforated casing section 23 is perforated "by a separate perforating string having a perforating gun on its lower end prior to the insertion of bottom hole assembly 18." Achee, 4:30-35.

Thus, for at least the reason that Achee fails to disclose a screen assembly and perforating gun assembly that are adapted to be run downhole as a unit, Achee fails to anticipate independent claim 1. As such, Applicant requests withdrawal of the § 102 rejection of this claim.

Claims 2-18 are patentable for at least the reason that these claims depend from an allowable claim.

§§ 102 and 103 Rejections of Claims 29-34:

The method of independent claim 29 includes placing a one-trip completion system in its proper position in the well using a rig, removing the rig and after removal of the rig, running a continuous medium downhole into the one-trip completion system. The method of claim 29 recites actuating and operating the one-trip completion system using the continuous medium.

Contrary to the limitations of independent claim 29, Lund fails to teach or suggest actuating a one-trip completion system using a continuous medium. The Examiner refers to the claims of Lund, claims that set forth running a coiled tubing at least partially into a conduit that is secured to a casing of a well. Lund, 13:62-67 and 14:1-19. However, this cited passage fails to teach or even suggest actuating a one-trip completion system using the coiled tubing.

Placing the cited language in its proper context, Lund describes running a coiled tubing into a production tubing and upper conduit 26, "to clean any remaining packing material out of the production tubing and upper conduit 26." Lund, 6:49-55. After this cleaning is complete, Lund describes that downhole equipment, such as a packing valve 30 and a production valve 55, may be operated with a wireline. Lund, 6:58-60.

Lund also describes an embodiment in which coiled tubing equipment 316 is used to run a coiled tubing through production tubing 312 to flush out any remaining carrier fluid and/or packing material from the production tubing 312, an upper conduit 218 and a middle conduit 220. Lund, 8:47-52. In connection with this embodiment, Lund describes that the coiled tubing is removed from the production tubing so that wireline from wireline equipment may be used to operate various downhole tools. Lund, 8:52-59. Thus, this other embodiment of Lund likewise fails to teach or even suggest actuating a one-trip completion system using a continuous medium.

To summarize, contrary to the explicit limitations of independent claim 29, Lund describes using a wireline for purposes of actuating downhole equipment, as the disclosed coiled tubing is merely used for cleaning purposes. Therefore, Lund fails to teach or even suggest actuating a one-trip completion system using a continuous medium. For at least this reason, Lund fails to anticipate independent claim 29.

Claims 30-34 are patentable for at least the reason that these claims depend from an allowable claim.

§ 102 Rejection of Claim 35:

The method of independent claim 35 recites after removal of the rig, running a continuous medium downhole to engage a sand screen and move the sand screen to a position that is adjacent to perforations.

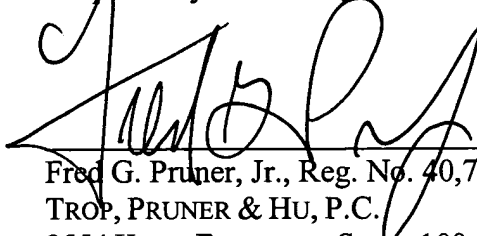
Contrary to the limitations of independent claim 35, Lund fails to teach or suggest running a continuous medium downhole to engage a sand screen to move the sand screen. See discussion of independent claim 29 above. In particular, although Lund discloses a running a coiled tubing downhole, there is no teaching or even a suggestion in Lund that the coiled tubing is somehow used to engage or position a sand screen or any downhole equipment. As such, Lund fails to anticipate independent claim 35 for at least this reason.

Thus, for at least the reasons that are set forth above, withdrawal of the § 102 rejection of claim 35 is requested.

CONCLUSION

In view of the foregoing, withdrawal of the §§ 102 and 103 rejections and a favorable action in the form of a Notice of Allowance are requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHL.0295US).

Respectfully submitted,



Fred G. Pruner, Jr., Reg. No. 40,779  
TROP, PRUNER & HU, P.C.  
8554 KATY FREEWAY, SUITE 100  
HOUSTON, TEXAS 77024  
713/468-8880 [Phone]  
713/468-8883 [Fax]

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